

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:17-cv-00454-GKF-JFJ
)	
1) CASTLE HILL STUDIOS LLC)	
(d/b/a CASTLE HILL GAMING);)	
2) CASTLE HILL HOLDING LLC)	
(d/b/a CASTLE HILL GAMING); and)	
3) IRONWORKS DEVELOPMENT, LLC)	
(d/b/a CASTLE HILL GAMING))	
)	
Defendants.)	

**DECLARATION OF MICHAEL SAWYER IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE PLAINTIFF'S
EXPERT STACY FRIEDMAN**

1. I am an attorney with the law firm of Covington & Burling LLP, counsel for Plaintiff Video Gaming Technologies, Inc. ("VGT"). I was admitted *pro hac vice* in this case on August 9, 2017.

2. Attached as **Exhibit 1** is a true and correct copy of the *curriculum vitae* ("CV") of Stacy A. Friedman.

3. Attached as **Exhibit 2** is a true and correct copy of excerpts from the transcript of the deposition of Stacy Friedman, taken on September 24, 2018.

4. Attached as **Exhibit 3** is a true and correct copy of the Declaration of Stacy Friedman in Support of Plaintiff's Response to Defendants' Motion for Summary Judgment, dated November 16, 2018.

5. Attached as **Exhibit 4** is a true and correct copy of excerpts from the transcript of the 30(b)(6) deposition of Daniel J. Fulton, taken on August 1, 2018.

6. Attached as **Exhibit 5** is a true and correct copy of excerpts from the transcript of the deposition of Arthur A. Watson III, taken on July 12, 2018.

7. Attached as **Exhibit 6** is a true and correct copy of an email from Alan Roireau to Jason Sprinkle sent on August 19, 2015, and an excerpt of its accompanying attachment. This exhibit consists of Bates numbers CHG0023446–47.

8. Attached as **Exhibit 7** is a copy of records from VGT’s source code repository, consisting of Bates numbers VGT0052992–95, which have been authenticated by the Declaration of Josh Davis in Support of Plaintiff’s Motion for Partial Summary Judgment (Dkt. 179) (“Davis Declaration”).

9. Attached as **Exhibit 8** is a copy of records from VGT’s source code repository, consisting of Bates numbers VGT0064944–46, which have been authenticated by the Davis Declaration.

10. Attached as **Exhibit 9** is a true and correct copy of an email sent from Robert C. Gill to Gary Rubman on October 2, 2018.

11. Attached as **Exhibit 10** is a true and correct copy of excerpts from the Opening Expert Report of Stacy Friedman, dated August 10, 2018.

12. Attached as **Exhibit 11** is a true and correct copy of excerpts from the Rebuttal of Stacy Friedman by Robert Zeidman, dated August 31, 2018.

13. I declare under penalty of perjury that the foregoing is true and correct.
Executed on November 16, 2018, in Washington, D.C.

/s/ Michael Sawyer
Michael Sawyer

CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2018, I caused the foregoing to be filed via ECF,
which effected service on the following counsel for Defendants:

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/s/ Gary M. Rubman